



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

409 3rd Street, SW, Suite 300
Washington DC 20024

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 7, 2007

Mr. Randy Barnard
Vice President,
Operations and Gas Control
Williams Gas Pipeline
2800 Post Oak Boulevard,
Houston, TX 77056

CPF 1-2007-1008W

Dear Mr. Barnard

During the week of December 11, 2006, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your District 520 in Salladasburg, Pennsylvania.

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation is

1. **§192.605**

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. . . .

In a review of records for the Wharton meter station, the annual test sheets for 2003 through 2006 indicate that the regulators CV1 and CV2 were no longer tested since the station had been made inactive. Williams procedures, Abandonment or Inactivation of Facilities (Procedure 70 15 01 06) states in Sec 6 0 **Deactivating a Meter Station Facility** requires that *(1) the valve that is closed to prevent the flow of gas must have a locking device to prevent the opening of the valve by an unauthorized person (2) [the operator shall] install a mechanical device or fitting that will prevent the flow of gas in the service line or in the meter assembly (3) the piping shall be physically disconnected from the customer's facilities*. In the securing of the bidirectional regulators, Williams only closed the four valves (one on each side of the two regulators) and secured them with electrical ties and marking with a "Do not operate" tag. This does not satisfy the requirements of your procedures.

PHMSA's findings are based upon the test records for the regulators in the meter station from 2002 to 2006, photographs of the unsecured valves adjacent to the regulators and Williams procedures for deactivation of facilities.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item identified in this letter. Failure to do so will result in Williams being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 1-2007-1008W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Sincerely,

For Mark Wendoff

Byron Coy, PE
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration